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them against the repetition of these experiences and would secure the advantages of the *plébiscite* without any of those dangers which usually attend its employment in a crude state of political society. This seems to me a decidedly optimistic view of French conditions.

J. W. BURGESS.

The Judicial Interpretation by the United States Courts of the Act of Congress relating to the Tariff. By WILLIAM WILKINS CARR, of the Philadelphia Bar. Philadelphia, P. and J. W. Johnson & Co., 1894.—vii, 631 pp.

The main value of Mr. Carr's book is in its collection of the decisions of the United States courts upon the present tariff and customs administrative acts. The book embraces not only these decisions, but also most of the federal decisions since the formation of the Union relative to this matter of tariffs. As Mr. Carr points out in his preface,

the decision of a court upon a tariff act does not cease to be of value after a modifying act has been enacted; and the terms of the earlier legislation and judicial decisions thereon must be considered in order to determine the Congressional intent of a later act.

Such decisions are also valuable as precedents in cases of a similar character which may come up under later acts; but apart from the later decisions, it must be confessed that Mr. Carr has contributed very little to our knowledge of the law upon the subject. Mr. Elmes's excellent work upon *The Law of the Customs* must remain still the standard treatise on this little-understood branch of the law.

The great fault of Mr. Carr's work is that it is almost entirely lacking in any attempt at classification. I know of no book upon the law that is more deficient in this particular. The work is almost impossible to read, though it is conceivable that by a judicious use of the index a person in search of precedents might find what he wishes. Chapter follows chapter without any particular reason for the sequence, while the same subject is treated here and there at haphazard in different parts of the book. In many cases it would appear as if the author's work had been little more than to take the *syllabi* of the cases to be found in the digests, and insert them in the order in which he happened upon them. At the same time, the book is more useful as a digest than a digest itself, since it is special in character, and so renders the finding of a case more simple. It must be admitted, also, that it is the only work in which the new cases are to be found.

F. J. GOODNOW.